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*Attorneys for Plaintiff LifeVantage Corp.*

**IN THE Third JUDICIAL DISTRICT COURT  
IN AND FOR Salt Lake County, STATE OF UTAH**

LIFEVANTAGE CORPORATION, a Colorado corporation,

Plaintiff,

v.

WILLIAM "BILL" DELANEY, an individual; and CYNTHIA DELANEY, and individual

Defendants.

**DECLARATION OF JOY BUDNER**

Civil No. \_\_\_\_\_

Judge \_\_\_\_\_

I, Joy Budner, declare under penalty of perjury the following:

- I am over twenty-one (21) years of age, am of sound mind, understand the taking of an oath, have personal knowledge of every statement made in this Declaration, all of which statements are true and correct, and am fully competent to testify to matters stated herein.
- I am currently a United States enrolled independent distributor with LifeVantage Corporation ("LifeVantage"). I reside in Jacksonville Beach, Florida. I have worked with LifeVantage as a distributor since in April 2010.
- My LifeVantage enrollers are Gabe and Jill Pearson who are Master Pro 10 distributors (the highest level at LifeVantage).

- On or around April 29, 2016 I received a LinkedIn request from Cynthia Delaney. I recognized her name because of her association with LifeVantage—I have seen her speak at LifeVantage events and if I recall correctly, Cynthia Delaney is a Pro 10 distributor. I have never met her and do not know her personally. She is not part of my group up-line or down-line.

- Prior to her April 29, 2016 LinkedIn request, we were not connected previously on LinkedIn or any other social media. I am not sure how she got my name in order to initiate contact. In fact, I thought it was odd and that prompted me to take a screenshot of the request. A copy of this screenshot is attached as Ex. A to this Declaration.

- I accepted the request. About 3 or 4 days later I received a huge message in my feed authored by her. It was a long post and not typical of the short, concise messages that usually come through LinkedIn. The message was personal and talked primarily about Cynthia's desire to diversify from LifeVantage. I took this as a solicitation to me with respect to this new "opportunity." I can't think of any other reason why she would have sent it to me.

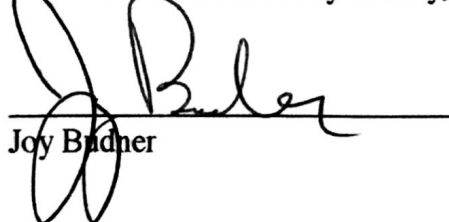
- I was immediately concerned because, by my estimation, this message went to other LifeVantage distributors who are in my downline – who Cynthia would have been able to connect to only by connecting to me. I was mortified by that and immediately disconnected from her LinkedIn network.

- I have discussed this incident with other LifeVantage distributors, both in my up-line and downline. Serious concerns have been expressed amongst my group of contacts about this communication from Cynthia Delaney and I have had to answer and address many questions concerning it.

- I am aware of individuals in my downline (and not in Cynthia's downline) who have recently been in personal contact with Cynthia Delaney and I have seen, from social media and other sources, that meetings have taken place. These have occurred in the last month or two.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 25th day of May, 2016



Joy Budner